

State Ethics Commission

ANNUAL REPORT 1994





STATE ETHICS COMMISSION
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Staff Counsel

STATE ETHICS COMMISSION

SIXTEENTH ANNUAL REPORT

January 1, 1994 - December 31, 1994

NOTE: April E. Sepulveda was appointed to the Commission in 1994 and attended her first meeting in July. Charles O. Monk, II was not a member in 1994 but was appointed in 1995 prior to the formal release of the Annual Report.

STATE ETHICS COMMISSION

Sixteenth Annual Report

January 1, 1994 - December 31, 1994

GENERAL STATUTORY IMPLEMENTATION

The State Ethics Commission met 9 times during Calendar Year 1994. The number of meetings has been limited in part due to fiscal limitations, but this problem is not as significant as it was in the recent past. The Commission and its staff were also forced to continue to limit program operations in some areas due to reduced operational fiscal support. Programs for automating lobbying and financial disclosure activities were also stalled as a result of fiscal cutbacks and the limitations in staff resources. In July 1994, some additional fiscal support assistance became available that will reduce these problems.

During the year the Commission was involved in program activity relating to all areas of its statutory mandate. These include financial disclosure, conflict of interest, lobbyist disclosure and restrictions, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters, employee education, and public information activities. Substantial activity also involved implementing the new provisions of the law which relate to procurement specifications and procurement lobbying. Commission regulations were reviewed during 1994 with adjustments being made where appropriate. The Commission and its staff were also involved in closely monitoring the redrafting of the Ethics Law by the Code Revision Committee. In view of a lack of filing space and equipment, the Commission further revised its records retention program. It is anticipated that the space problems will be resolved early in 1995.

Issuance of Advisory Opinions

The Commission issues advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to the Law. Additionally, the Commission may issue advisory opinions to other persons at its discretion. During Calendar Year 1994, the Commission issued 13 formal published opinions. Most of the formal opinions issued primarily dealt with the employment prohibitions under §3-103(a) of the Ethics Law. Other issues considered included gifts, jurisdiction over officials, misuse of position, the application of the Prince George's County land use ethics law requirements, political activity, and procurement. One factor reducing the number of formal opinion requests and opinions issued by the Commission is the large number of existing opinions that can now be used for fast informal guidance. The Commission staff was able to provide informal guidance in about 925 potential formal request situations based on existing opinions of the Commission. The Commission itself provided informal advice in lieu of formal opinion guidance, usually in the form of a letter, in 88 situations during the year. Informal guidance covered nearly all aspects of the Ethics Law. Many advice inquiries were in part caused by State employee salary support limitations in State government which has resulted in a substantial number of post-employment and secondary employment questions. The combined total number of advice situations (formal, Commission informal, and staff informal) increased significantly during 1994.

Financial Disclosure

The administration of the financial disclosure program continued to involve the identification of those required to file, providing technical assistance to filers, and monitoring compliance with the Law. The Commission was involved in reviewing a large number of requests by various agencies to add or delete people from the financial disclosure filing list. Action on these requests has increased the list of filers. The Commission also reviewed the ethics law status of new boards and commissions and considered and acted upon requests by advisory boards to be exempted from the requirement to file financial disclosure statements. Compliance review of forms is conducted as part of a phased program for review of the forms of officials and employees. Currently there are over 7,500 persons filing financial disclosure forms and this number continues to grow. In addition, copies of all judicial official financial disclosure forms are also filed at the Commission office. As part of the review program, letters are sent to some filers regarding the need to provide further information in order to meet filing requirements. The elimination of the position in late 1992 assigned to carry out most of the review led to a substantially reduced review program during that year and this impacted on 1993 to an even greater extent. However, this position was restored in late 1994 and will result in a stronger review program in 1995.

In addition to the regular financial disclosure program, a very substantial number of gubernatorial appointees to boards or commissions seeking limited conflict of interest exemptions from the appointing authority and from the Senate where confirmation is required, must file a form disclosing areas of existing conflicts with the Commission and the appointing authority. The Commission staff coordinated the filing of these forms with the appointing authority and assisted with a large number of appointees throughout the year to complete these disclosures.

Lobbyist Disclosure and Regulation

During the lobbying year which ended on October 31, 1994, 1,184 lobbying registrations were filed with the Commission. This represents a decrease from the 1,208 registrations filed in 1993. The 1,184 registrations were filed by 490 different lobbyists on behalf of 735 separate employers. (Some employers have more than one lobbyist and many lobbyists have more than one employer.) This compares to 698 employers having one or more registrants in the previous year and 510 individual lobbyists in the prior year. Although the largest number of lobbyists are registered during the legislative session, registrations are beginning and ending throughout the lobbying year, which begins on November 1 and ends on October 31 of the following year. Most persons registered to lobby have a single registration representing one employer, however, 75 lobbyists had two or more registrations during this time period, 48 registrants had four or more employers, and 30 lobbyists had eight or more employers. The Ethics Commission monitors lobbyist registration and reporting and other parts of the lobbying law limiting contingent fees and campaign finance activity.

The \$14,224,619 in lobbying expenditures reported for the period of October 31, 1994, represents an increase of \$209,643 over the previous year. Lobbying expenditures have significantly increased since the Commission compiled \$2,864,454 of expenditures in 1979, the first year the Ethics Commission administered the filing program. Expenditures for gifts and entertainment decreased from \$824,685 to \$746,132. An analysis of individual reports indicates that 66 lobbyist employers reported having total lobbying expenditures of \$50,000 or more. There were 165 lobbyist employers reporting total expenditures of \$25,000 or more. Reports of individual lobbyists registered on behalf of one or more employers indicate that 36 of these persons reported \$50,000 or more in compensation for services. Twenty-six lobbyists reported compensation of \$100,000 or more. Examples of topic areas involving

large total employer expenditures during the reporting period included banking, professional football, health, labor, business, attorneys, utilities, lottery, horse racing, and insurance. To some extent, 1994 figures may have been impacted by it being an election year. Generally, there is very little summer legislative committee activity in election years and this lack of activity tends to reduce lobbying for the year. A list of those employers expending \$25,000 or more and those lobbyists reporting \$50,000 or more in compensation is included in Appendices A and B of this report.

The following expenditure data summarizes lobbying expenditures for the last three lobbying years:

	<u>10/31/92</u>	<u>10/31/93</u>	<u>10/31/94</u>
1. Expenditures for meals and beverages for officials or employees or their immediate families.	\$ 413,610	\$ 404,921	\$ 354,815
2. Expenditures for special events, including parties, dinners, athletic events, entertainment, and other functions to which all members of the General Assembly, either house thereof, or any standing committee thereof were invited. (Date, location, group benefitted, and total expense for each event are also reported.)	\$ 242,169	\$ 262,846	\$ 245,288
3. Expenses for food, lodging, and scheduled entertainment of officials and employees and spouses for a meeting given in return for participation in a panel or speaking engagement at the meeting.	\$ 20,374	\$ 11,136	\$ 14,280
*4. Expenditures for gifts to or for officials or employees or their immediate families (not including sums reported in 1, 2, and 3).	\$ 127,177	\$ 145,783	\$ 131,749
<u>Subtotal of items 1, 2, 3, & 4</u>	<u>\$ 803,330</u>	<u>\$ 824,686</u>	<u>\$ 746,132</u>
5. Total compensation paid to registrant (not including sums reported in any other section).	\$10,436,523	\$11,069,943	\$11,039,131

* This category includes the value of race track passes distributed by racing industry lobbyists to State officials. \$68,875 of the \$131,749 reported for gifts in the period ending 10/31/94 reflects the value of these passes.

6. Salaries, compensation and reimbursed expenses for staff of the registrant.	\$ 701,103	\$ 565,697	\$ 526,842
7. Office expenses not reported in items 5 and 6.	\$ 702,045	\$ 783,917	\$ 659,935
8. Cost of professional and technical research and assistance not reported in items 5 and 6.	\$ 401,749	\$ 171,154	\$ 289,149
9. Cost of publications which expressly encourage persons to communicate with officials or employees.	\$ 391,287	\$ 182,622	\$ 404,646
10. Fees and expenses paid to witnesses.	\$ 33,351	\$ 73,482	\$ 15,787
11. Other expenses.	\$ 375,174	\$ 343,475	\$ 542,998
<u>Total of items 1 through 11</u>	<u>\$13,844,562</u>	<u>\$14,014,976</u>	<u>\$14,224,620</u>

Enforcement Activities

The Ethics Law and implementing rules of the Commission provide that any person may file a complaint with the Commission. Complaints filed with the Commission must be signed, under oath, and allege a violation of the Law by a person subject to the Law. Additionally, the Commission may file a complaint on its own initiative, and it carries out preliminary inquiries of potential law violations at its discretion. Because of the limited investigative resources available to the Commission and a shortage of operational expenses, there is a backlog of enforcement issues pending before the Commission. The restoration of a contractual position in late 1994 should help to reduce this problem.

In Calendar Year 1994 the Commission issued or accepted 91 complaints. Seventy-nine complaints involved financial disclosure matters, 6 complaints involved lobbyist matters, and 6 complaints related to conflict of interest issues. Also, during this year action was completed on 46 complaints. Thirty-nine of these completed complaint cases were financial disclosure matters and 5 were lobbyist matters. Twenty-nine failure to file timely financial disclosure complaints were terminated by accepting late filing as a cure. Twelve late financial disclosure filing cases were completed by submission of the form, an admission of late filing violations, waiver of confidentiality, acceptance of a reprimand, and the payment of funds to the State. Five complaints against lobbyists for failure to timely file were terminated by accepting a late filing as a cure. The Ethics Law provides for the possibility of late fees or court imposed fines in late filing situations in some circumstances. One complaint against a lobbyist for violation of the campaign contribution transmittal prohibition was completed by the lobbyist admitting the violation, accepting a reprimand, and payment of \$1,000 in lieu of potential civil fines. Ninety-eight complaints for failure to timely file financial disclosure or lobbying reports were still active at the end of the calendar year. Forty-nine of these complaints were issued during the last two months of 1994.

The Commission considered several other situations involving lobbyists who had failed to timely file either a registration or lobbying activity report. These matters resulted in

lobbyists paying the fees in the amount of up to \$250 per report as allowed by the Ethics Law. The Commission received a total of \$1,770 in payments to the State of Maryland representing late fees from lobbyists.

One conflict of interest complaint was resolved during Calendar Year 1994. The matter was resolved by an agreement where the respondent had disposed of an interest, accepted a public admonishment, and agreed to pay \$1,000 to the State in lieu of potential fines. At the end of Calendar Year 1994, 9 complaints were pending involving conflict of interest.

Local Government Ethics Laws

Maryland counties and cities are required under Title 6 of the Ethics Law to enact local laws similar to the State Law. In addition to the requirement that counties and cities enact ethics laws, in 1983, the General Assembly amended the Law to require local school boards either to promulgate ethics regulations similar to the State Law or be covered by county ethics laws. Most of the staff activity relating to local ethics programs during 1994 involved providing limited technical assistance to local ethics officials regarding ongoing administration of local government ethics programs. As part of its responsibilities, the Commission reviewed new or revised ethics laws for 6 localities during 1994. Some amended local laws were still under review at the end of the year. Criteria for evaluating similarity to the State Law are defined in Commission regulations. Municipalities, based on size and other factors, may be exempted from all or part of the requirement, though an exemption may be granted only in response to a written request. One small municipality was exempted in 1994.

Educational and Informational Activities

The Commission staff has been active in providing information to those covered by the Ethics Law, as well as other persons interested in its requirements. A substantial daily staff workload has involved advising employees, officials, candidates and lobbyists on how to complete forms, and providing informal advice regarding possible conflicts of interest. The Commission staff has also assisted local government and school board officials in drafting their ethics laws and regulations. The staff has also provided technical advice to local government ethics boards. Presentations were made by the staff to various groups covered by the Law or interested in the operation of the Law.

Part of the Commission's public information activity involves distribution of lists of registered lobbyists and provision of assistance to persons inspecting various forms filed with the Commission. Pamphlets describing the Ethics Law have been made available to management level employees in State agencies. Another pamphlet covering ethics requirements for part-time members of State boards and commissions is also being distributed on a limited basis. The Commission had also initiated an Ethics Bulletin which covered prohibitions, rules, procedures and Commission decisions along with a special bulletin sent to lobbyists when changes are made in that program. These two bulletins have been suspended due to fiscal limitations but may be partially re-instituted in 1995. Fiscal limitations have essentially eliminated the ability to develop printed materials and distribute mailed items relating to this part of the Commission program. The Commission's staff does distribute, through interagency mail, a special two-page summary of ethics requirements to State agency managers. Special memos regarding the impact of the ethics law on gifts, employment, and on political activity are also distributed. In 1994, a comprehensive memo on the new procurement and lobbying laws was developed and distributed to lobbyists, vendors, and other interested persons.

In 1993, the Commission decided to strengthen its employee ethics training programs which had been curtailed due to fiscal limitations. Programs in conjunction with the Department of Personnel have been established and 25 employees or board and commission member seminars were presented at various agencies in 1994. This is the most significant new training effort since the inception of the Law. Additionally, a how-to-complete financial disclosure statements video was made in conjunction with the Department of Human Resources for distribution during 1995.

LEGISLATIVE RECOMMENDATIONS AND ISSUES

In 1994, the General Assembly passed five bills that directly amended the State Ethics Law. These bills, included new procurement and lobbying requirements, revising non-participation requirements to cover matters involving adult children, and establishing a \$20 lobbyist registration fee. Also passed was legislation limiting local lobbyist fundraising in Montgomery and Prince George's Counties and a bill requiring certain special campaign contribution disclosures in Montgomery County.

The Commission continues to review the adequacy of the Public Ethics Law as required by the statute and has been monitoring the redrafting of the Ethics Law by the Code Revision Committee. Specific recommendations relating to code revision drafts have been made to that Committee. The seven recommendations listed below were specifically suggested by the Commission to the Administration for legislation in 1995.

1. Gift Disclosure

Under the current provisions of the State Ethics Law, officials and lobbyists are required to report gifts. A major problem is that these reporting requirements are not the same. This results in confusion, inconsistent and inadequate disclosure reporting by officials and lobbyists. The lobbyist reporting program has the more significant weaknesses generally having higher reporting thresholds, containing provision that limit gifts of less than \$15 per day from reporting thresholds and including the allowability in most instances for lobbyists with more than one client to prorate the cost of gifts thus avoiding recipient disclosure. There is a need for uniform gift disclosure by lobbyists, (their employers), and officials. Generally, this disclosure should specifically deal with proration of gifts and reflect the requirements for officials financial disclosure. The new program should provide that lobbyist disclosure be made on a time schedule to coincide with the information needed by officials to file their annual disclosure by April 30th each year.

2. Financial Disclosure - Attribution of Blind Trust

The State Ethics Law contains two major prohibitions which impact on the ownership interests of officials and employees. The first prohibition is contained in Article 40A, Section 3-101. This section prohibits an official or employee from participating in any matter in which he has an interest. The section also prohibits participation in other situations not the subject of this proposal. The main form of ownership interest impacted by Section 3-101 is holding stock in corporations. The second interest prohibition contained in Article 40A is Section 3-103(a). This section absolutely prohibits the holding of a financial interest in certain situations where the entity does business with or is regulated by the employees or officials agency or an affiliated agency. Both of these sections have exception authority that can be exercised by the State Ethics Commission. This authority has been exercised under 3-103(a) by regulations to some extent and under 3-101 by opinion in one instance as to a

non-interest restriction. Generally, issues arise under the two sections in a variety of circumstances. Some officials have only a few very small holdings, others have a large holding in one or two companies that relate to their State position. Others have fairly limited holdings in a broad range of companies. This proposal is aimed at this third type of situation where an official has broad holdings that could be at issue depending on the facts at the particular time and where sale of these holdings would not be reasonable under the circumstances. The proposal is not aimed at using a blind trust for narrow holdings held in regulated entities by regulators or those involved in procurement.

The Commission proposes the blind trust to apply to the broad stock holding situation. Under this program the Commission would implement its blind trust regulations which eliminates the application of 3-101 and 3-103(a) to blind trusts established and approved under Commission regulations. These regulations would be similar to the federal requirements for these types of trusts. In order to implement the regulations, legislation is needed to provide that the holdings in approved blind trusts would not have to be included in the annual financial disclosure statements.

3. Post Employment

The current public Ethics Law regarding post-employment activities contains very technical language requiring close analysis to determine its application. Although the Law's intent is to protect the public interest, standing alone it has weaknesses in providing clear guidance and in enforcement cases. This is particularly true in evaluating the conduct of higher level employees with primarily management responsibilities. Limited amendments to the current law are proposed which would not apply to legislators or part-time board and commission members. Essentially, the proposal adds to the current law, does not generally prevent private employment or contacts with the official's former agency but it does prohibit participation for compensation in post-employment matters for one year if the matter was in existence and part of the official's responsibility during the person's last 12 months of State service. The legislation would have exception authority and be limited to matters involving grants, procurement, regulatory authority, and tax liability. The amendments would not cover subsequent governmental employment.

4. Judicial Branch Employees Financial Disclosure

The current State Ethics Law requires all employees in the Judicial branch of government at Grade 16 to file financial disclosure even if their functions would not require disclosure if in the Executive Branch or even the Legislative Branch. This proposal would allow the Commission to exclude some Grade 16 employees (such as court reporters, or judge's secretaries) after getting the recommendation of the State Court Administrator where it is also found that these employees are not in policy, policy advice, quasi judicial, or procurement related positions.

5. Financial Disclosure - Corporate Dividends

The existing Ethics Law requires the disclosure of corporate interest and the details regarding all corporate interests acquired as transferred during a reporting period. The requirement to keep track of even minor changes is the subject of concern and errors by a large number of filers particularly as it relates to minor changes typically caused by dividend related transactions from the filing requirement. The proposed legislation would delete details of minor dividend related transactions from the filing requirement, but would not

weaken the basic accountability needed to maintain public confidence in the Law. The requirement that the total number of shares held at the end of the year be reported is not impacted by this change. This change would eliminate this detail in most of these types of dividend or dividend reinvestment programs.

6. Misuse of Confidential Information

The current Ethics Law prohibits officials and employees from disclosing or using confidential information for their own economic benefit or that of another. The Commission believes that this restriction should be extended to cover officials and employees who improperly use such information acquired while an official or employee after they leave State office or employment.

7. Payment of Court Fines

The current Ethics Law is not clear as to the recipient of any court ordered Ethics Law fines. The Commission recommends that the Law be clarified to state that these fines would be paid to the State of Maryland.

Other Legislative Recommendations

The recommendations listed below are also made by the State Ethics Commission. Many of these recommendations have appeared in prior annual reports but some, particularly relating to lobbying, are new. The Commission believes that these recommendations are appropriate, based on its experience in administering the ethics program:

- The Law should be formally amended to more specifically reflect advice by the Commission and the Attorney General regarding testimonial fund raising by employees and officials, which is fully covered by the Ethics and Elections Law.

- There is a need to consider granting the Commission at least minimal fining authority in conflict of interest matters in order to reduce delay and expensive court proceedings.

- The current Law does not seem to always clearly deal with gifts from foreign governments. There is a need to review the issue and clarify the Law.

- The Ethics Law prohibits certain types of representation before State agencies. However, except for legislative disclosure under §3-102 of the Ethics Law, there is no specific required disclosure of representation before State agencies. It is recommended that officials who appear before State agencies for compensation include on their annual disclosure form at a minimum the identity of any agencies involved in this compensated representation.

- The Ethics Law prohibits employees and non-elected officials from intentionally using their prestige of office for their own private gain or that of another. Elected officials, however, are not covered by this provision. The existing Law should be amended to include elected officials or a new provision covering these officials dealing with clear cases of abuse should be specifically added to the Law.

- The Commission has been presented with several situations where high State officials have been invited to serve on the board of directors of private corporations having sensitive business or regulatory involvement with the State. The existing Ethics Law provisions are not well designed to effectively control the conflicts that can be caused by such affiliations. It is recommended that membership by high officials on the boards of these types of corporations be controlled more specifically in the Ethics Law.

- Issues regarding the spouses of employees or officials have arisen in Maryland and on a national basis. The Maryland Public Ethics Law does not consistently and clearly address these issues or provide sufficient policy guidance in these matters. Spouse ethics issues have become more prevalent in part as a reflection of both spouses having careers and other economic relationships. For example, the Law does not always clearly deal with the acceptability or disclosure of gifts to spouses of officials or employees by various donors. Another significant area needing further clarification is under what circumstances the ownership interest of a spouse is to be attributed to the official or employee for conflict of interest purposes under §3-103(a) of the Ethics Law.

- The Commission receives many questions from agencies and others concerning issues involving State related foundations. Some of these questions relate clearly to the Ethics Law and can be resolved by the Commission. Many of these questions involve fiscal and general policy issues unrelated or only indirectly related to the Ethics Law. It is not possible for the Commission to determine appropriate policy in these areas. Any control mechanisms that need to be established to reach these concerns should be established by the Executive and Legislative branches of government as part of ongoing policy development.

- Consideration should be given to having new officials file a financial disclosure statement covering their holdings as of the time when they come into their position rather than for the previous calendar year.

- The law should be amended to expressly state that Deputy Sheriffs and other Sheriffs' Office employees other than the elected Sheriff are also covered by local ethics laws consistent with the Commission's advisory opinion on this topic.

- The need for disclosure of interests in mutual funds should be reviewed to determine if this information is fully necessary to accomplish the purposes of the Law.

- The provisions of §4-104(c) regarding attributable interests should be studied with the idea of reducing the burden caused by the disclosure requirements when a person has a small share in a large diverse testamentary trust.

- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other State officials.

- In election years improperly filed candidate's disclosure forms create unique enforcement problems. Before a violation can be found and made public a variety of confidential administrative and adjudicatory processes have to occur. In most cases this process would extend well beyond the primary election and probably beyond the general election. This means that serious completion problems or even false disclosure could exist unknown to the voting public. A very large percentage of non-incumbent candidates have substantial financial disclosure statement completion problems. A review should be made by the Executive and the General Assembly to determine whether confidentiality should be eliminated for candidate's financial disclosure enforcement cases at an earlier point in the enforcement process.

- Some consideration should be given to removing the current language dealing with Commission review of forms in §2-103(e), and substituting a provision for review consistent with standards to be established by the Commission.

- In order to avoid uncertain and confusing application and administration of the Law, the special provisions of §6-202 making members of State boards funded in whole or in part by Baltimore County subject to the county disclosure law instead of the State Law should be considered for elimination, or at a minimum copies of these forms should be filed with the State Ethics Commission.

- There is a need to more expressly deal with the financial disclosure requirements for interests in limited liability companies and limited liability partnerships.

- The bi-county agency ethics regulations requirements as to employees of these agencies should be reviewed to make sure that sufficient penalty provisions are provided and that the current ethics regulations of the agencies meet the intent of the Law.

- The Commission has informally determined that the bi-county agencies are to be treated as State or local agencies for the purposes of exemptions under the State lobbying registration requirements. The Law should be amended to specifically clarify their status under these provisions.

- There is a need to review whether the requirement that a lobbyist must always be in the physical presence of an official in order to be required to register should be retained in the Law.

- The lobbyist restrictions regarding campaign finance activity should be made more specific as to the impact of these provisions on political party central committee membership by lobbyists.

- Consideration should be given to further limiting the role of lobbyists in political fundraising, particularly in the area of sending fundraising tickets to lobbyists and these tickets being forwarded to their employers.

- The statute of limitations in criminal violations of the State lobbying law is too short and should be extended.

- The lobbying laws should be amended to prohibit lobbyists and their employers from making gifts to officials or employees that the recipients cannot legally receive.

- Consideration should be given to a one-legislative session cooling-off period for legislative and other employees having significant duties relating to legislation.

- The provisions for confidentiality in the Ethics Law should be reviewed to determine if they adequately protect privacy without denying needed information to operations agencies or the public.

- The provisions covering school board ethics regulations need to be strengthened to assure that there are adequate sanctions for violations by board members, candidates for board membership and lobbyists.

- There is a need to clearly address whether the Maryland members of interstate boards and commissions are subject to the provisions of the Ethics Law.

APPENDIX A

EMPLOYER SPENDING \$25,000 OR MORE - ALL REGISTRANTS ALL TYPES OF EXPENSES

November 1, 1993 - October 31, 1994

TOTAL AMOUNT

EMPLOYER

1.	\$472,807.00	Baltimore Gas & Electric Company
2.	239,878.51	Pro Football, Inc. (The Redskins)
3.	201,416.00	Maryland Business Council
4.	180,984.08	Medical & Chirurgical Faculty of Maryland
5.	153,884.60	Cable TV Association of MD, DE, & DC
6.	152,600.62	Bell Atlantic-Md. Inc.
7.	150,918.63	Maryland Bankers Association
8.	140,858.93	GTECH Corporation
9.	129,475.25	Maryland Classified Employees Association
10.	128,524.94	Chemical Industry Council of Maryland
11.	**128,287.34	Maryland Jockey Club
12.	122,793.15	Medical Mutual Liability Insurance Society of Maryland
13.	122,772.05	Maryland State Teachers Association
14.	122,371.28	Health Facilities Association of Maryland
15.	113,441.94	Maryland State Bar Association
16.	110,287.00	Association of Maryland Pilots
17.	108,001.72	Maryland Association of Health Maintenance Organization
18.	105,265.17	Johns Hopkins Health System
19.	104,899.00	A T & T
20.	101,777.73	U.S. English
21.	101,486.00	Common Cause/Maryland
22.	100,011.25	Group Hospitalization & Medical Services
23.	95,150.36	Maryland Trial Lawyers Association
24.	89,682.53	Blue Cross & Blue Shield of Maryland
25.	87,434.76	Maryland Association of Realtors
26.	86,426.61	Nationwide Insurance Company
27.	86,412.95	Potomac Electric Power Company
28.	80,917.69	Potomac Edison Company, Inc.
29.	80,766.00	Maryland Hospital Association
30.	79,574.76	Bethesda Chevy Chase Chamber of Commerce
31.	78,614.08	Healthplus

** Includes Race Track Passes of \$68,875.

32.	77,280.03	Household Financial Group, Ltd.
33.	75,579.39	Prudential Health Care Plan
34.	74,124.45	State Farm Insurance
35.	73,966.18	ATANCA (Automotive Trade Association of the National Capital Area)
36.	71,706.60	Maryland Medical Laboratory, Inc.
37.	69,139.18	Washington Gas, Maryland Division
38.	67,453.00	American Petroleum Institute
39.	64,474.28	Maryland Highway Contractors Association
40.	63,957.66	Maryland Psychological Association
41.	63,721.43	Variable Annuity Life Insurance Co. (VALIC)
42.	62,681.69	Philip Morris, Inc. (PA)
43.	62,535.68	Correctional Medical Systems
44.	61,130.61	Merck, Sharp & Dohme
45.	60,130.57	PIE Mutual Insurance Company
46.	60,000.00	Maryland General Hospital
47.	58,711.00	Maryland Independent College and University Association
48.	58,696.36	Maryland Builders Association
49.	57,662.89	Pharmaceutical Manufacturers Association
50.	57,500.00	Tobacco Institute
51.	57,363.40	Laurel Racing Association, Inc.
52.	55,794.21	National Assn. of Independent Insurers
53.	55,372.11	National Federation of Independent Businesses
54.	54,544.17	Property Owners Assn. of Greater Baltimore
55.	54,485.96	FMC Baltimore - Agricultural Chemicals
56.	53,859.02	Maryland State & D.C. AFL-CIO
57.	53,824.59	Maryland Association of Certified Public Accountants
58.	53,709.24	American Insurance Association
59.	53,697.70	Sinai Hospital of Baltimore, Inc.
60.	53,348.00	CSX Corporation
61.	52,500.00	Marine Spill Response Corporation
62.	51,658.00	Maryland State Dental Association
63.	51,275.93	Metropolitan Clinics, Inc.
64.	50,237.72	Service America
65.	50,000.00	National Solid Wastes Management Assn.
66.	50,000.00	Honeywell
67.	49,366.29	Maryland Farm Bureau, Inc.
68.	49,288.56	Maryland Association of Chain Drug Stores
69.	48,014.72	Golden Rule Insurance Company

70.	47,159.11	Maryland Retail Merchants Association
71.	46,552.28	Maryland New Car and Truck Dealers Assn.
72.	46,395.08	Montgomery County Association of Realtors
73.	45,578.08	League of Life & Health Insurers of Md.
74.	45,000.00	Mayor and City Council of Baltimore
75.	44,530.66	Manor Care, Inc.
76.	44,467.98	R.J. Reynolds Tobacco Company
77.	44,450.85	Systemhouse
78.	43,629.00	Independent Cement Corporation
79.	43,305.21	Southwestern Bell Mobile Systems(Cellular One)
80.	43,155.55	Southland Corporation
81.	43,000.00	Dupont Company
82.	42,967.36	CSX Transportation
83.	42,668.27	Glaxo, Inc.
84.	42,576.88	Mid-Atlantic Coca-Cola
85.	42,428.25	UNISYS Corporation
86.	42,240.37	Maryland Managed Care Association, Inc.
87.	40,737.10	Health Insurance Association of America
88.	40,680.53	Crown Central Petroleum
89.	40,150.00	Giant Food, Inc.
90.	40,021.00	Maryland Insurance Council
91.	40,000.00	Chesapeake Amusements, Inc.
92.	39,123.00	Johns Hopkins University
93.	38,985.33	Bethlehem Steel Corporation
94.	38,792.28	Marylander's for Efficient and Safe Highways
95.	38,240.72	Maryland Pharmacists Association
96.	38,239.33	Ryland Group
97.	37,900.00	Planned Parenthood of Maryland
98.	37,689.00	Marylander's Against Handgun Abuse, Inc.
99.	37,550.16	Browning-Ferris Industries (MD)
100.	36,815.45	Options Mental Health
101.	36,507.30	Rouse Company, Inc.
102.	36,396.00	Greater Washington Board of Trade
103.	35,652.32	Maryland Chiropractic Association
104.	35,648.60	Municipal Bond Investors Assurance Corp.
105.	35,363.02	Syntex Laboratories, Inc.
106.	35,205.71	Multi-State on behalf of Ogden Systems, Inc.
107.	35,000.00	Ferst Companies

108.	34,994.56	Bail Bond Association of Maryland
109.	34,928.00	General Mills Restaurants, Inc.
110.	34,726.06	Distilled Spirits Council of the U.S.
111.	34,675.00	Crescent Cities Jaycees Foundation, Inc.
112.	34,652.48	Restaurant Association of Maryland, Inc.
113.	34,402.53	IBM Corporation
114.	34,166.66	Philip Morris, U.S.A. (NY)
115.	34,050.59	Rockville Center, Inc. and Marine Midland Bank
116.	33,745.00	MD/DC/DE Soft Drink Association
117.	32,899.27	Punitive Damages Reform Coalition
118.	32,500.00	Maryland Aggregates Association
119.	32,457.81	Maryland Rental Car Coalition
120.	32,319.57	Maryland Motor Truck Association, Inc.
121.	32,221.91	Aetna Life and Casualty Co.
122.	31,423.00	MedLantic Healthcare Group
123.	30,904.78	CIGNA Corporation
124.	30,863.56	Baltimore Jewish Council
125.	30,732.00	Maryland Association of Boards of Education
126.	30,509.00	National Medical Enterprises, Inc.
127.	30,442.61	Maryland Gaming Association, Inc.
128.	29,842.06	Maryland Academy of Physicians Assistants
129.	29,801.61	Nutrition Management Service Company
130.	29,782.50	Montgomery County Government
131.	29,484.37	MD/DC Society of Anesthesiologists
132.	29,384.78	United Thermal Development
133.	29,127.52	Sun Company, Inc.
134.	28,595.39	Professional Insurance Agents Assn. of PA/MD/DE
135.	28,443.23	Youth Services International, Inc.
136.	28,274.85	Maryland Optometric Association
137.	28,267.13	P.S.T. Reclamation, Inc.
138.	28,171.17	Maryland Securities Industries
139.	28,120.39	Baltimore Thermal Energy Corporation
140.	27,758.75	Maryland Radiological Society
141.	27,641.07	Bio Gro Systems, Inc.
142.	27,573.53	Kaiser Foundation Health Plan of Mid-Atlantic States
143.	27,500.00	Fountainhead Title Group, The
144.	27,288.80	Marriott Corporation
145.	27,258.22	Beretta U.S.A. Corporation

146.	27,217.62	Maryland State Licensed Beverage Assn.
147.	26,465.15	Maryland Works, Inc.
148.	26,454.53	Apartment & Office Bldg.Assn.of Metro Wash.
149.	26,417.42	Capital Reinsurance Company
150.	26,360.00	Air Transport Association of America
151.	26,282.95	Colonial Pipeline Company
152.	26,091.63	Citicorp Financial, Inc.
153.	25,935.99	MCI Telecommunications
154.	25,848.35	Maryland Improvement Contractors Assoc.
155.	25,764.12	Cigar Association of America, Inc.
156.	25,698.70	Maryland Rehabilitation & Employment Assn.
157.	25,455.00	American Lung Association of Maryland
158.	25,370.30	Maryland State Assn. of Life Underwriters
159.	25,232.95	Anheuser-Busch Companies, Inc.
160.	25,178.92	Browning-Ferris Industries (GA)
161.	25,162.33	Alamo Rent-A-Car
162.	25,141.22	National Assn. of Social Workers, MD Chapter
163.	25,140.30	Maryland Land Title Association
164.	25,015.00	Kraft General Foods & Philip Morris Mgmt.Corp.
165.	25,012.00	Delaware-MD Synod, Evangelical Lutheran Church

APPENDIX B

LOBBYISTS RECEIVING \$50,000 OR MORE IN COMPENSATION ONE OR MORE EMPLOYERS

November 1, 1993 - October 31, 1994

1 .	\$705,136.04	Bereano, Bruce C.
2 .	621,544.45	Rifkin, Alan M.
3 .	583,853.08	Evans, Gerard E.
4 .	463,488.40	Cooke, Ira C.
5 .	349,490.62	Goldstein, Franklin
6 .	339,255.92	Schwartz, Joseph A., III
7 .	297,157.04	McCoy, Dennis C.
8 .	282,064.47	Doyle, James J., Jr.
9 .	269,000.00	Rasmussen, Dennis
10 .	225,051.00	Enten, D. Robert
11 .	223,883.00	Pitcher, J. William
12 .	220,500.00	Manis, George N.
13 .	185,849.22	Doolan, Devin John
14 .	175,747.96	Shaivitz, Robin F.
15 .	169,578.12	Neil, John
16 .	152,183.50	Tiburzi, Paul A.
17 .	148,209.46	Burridge, Carolyn T.
18 .	145,562.50	Popham, Bryson
19 .	145,286.50	Adler, Maxine
20 .	125,630.75	Goeden, James P.
21 .	121,701.00	Neily, Alice, J.
22 .	117,940.96	Johansen, Michael V.
23 .	115,000.00	Gisriel, Michael U.
24 .	107,587.00	Wyatt, Joseph R.
25 .	106,330.25	Doherty, Daniel T., Jr.
26 .	100,000.00	O'Dell, Wayne
27 .	86,000.00	Wyatt, Maurice
28 .	83,356.25	Silver, Edgar P.
29 .	76,743.07	Winchester, Albert, III
30 .	68,981.22	Steward, William R.
31 .	67,647.50	Canning, Michael F.
32 .	60,497.14	Buckingham, Stephen
33 .	59,410.00	Davis, Michael H.
34 .	58,273.00	Dunbar, William M.
35 .	53,331.86	Bowers, John B., Jr.
36 .	50,000.00	Thienel, Stephen C.

